LAW OFFICES OF ALEXANDER M. DUDELSON

ALEXANDER M. DUDELSON

26 COURT STREET - SUITE 2306 Brooklyn, New York 11242 (718) 855-5100 FAX (718) 624-9552

OF COUNSEL LOUIS R. ROSENTHAL YEHUDA FARKAS

FABIAN G. PALOMINO (1924 - 2014)

October 18, 2024

VIA ECF

Honorable Naomi Reice Buchwald United States District Court Judge Southern District of New York 500 Pearl Street New York, New York 10007

> Rina Oh n/k/a Rina Oh Amen v. Virgina L. Giuffre Re:

> > Case No.: 1-21-cv-08839 (NRB)

Your Honor:

I am the attorney for the plaintiff in the above referenced matter. This letter is respectfully submitted to the Court, on the consent of Kathleen R. Thomas, Esq. and Jill Roth, Esq., attorneys for the defendant, as a Joint Status Report for this proceeding.

At the time of the pre-motion letter conference, counsel for the defendant indicated that there is information contained on the plaintiff's X accounts (formerly Twitter) that would be relevant to her motion for summary judgment. We further advised the Court that the plaintiff's accounts were either deleted pre-suit or suspended, and were not accessible.

A subpoena was served on X requesting access to the accounts. Eventually, X cooperated with the subpoena and we were granted access to download the complete data for two accounts, which included deleted posts. The various files that were downloaded are unprocessed information in the form of text, images and other data, which is significantly different than what a person would view on the X on-line platform. Defendant is currently using a third-party to process and analyze the contents of the files.

The parties jointly request that we file a status letter with the Court in (30) days. At that time the defendant should be able to proceed with her motion for summary judgment.

Thank you for your consideration.

Respectfully submitted,

Alexander Dudelson

Alexander M. Dudelson

Via ECF: All parties.